

Comments on Proposed FCC and Localism

I'm vice president-Broadcasting for Moody Radio in Chicago. We own and operate 36 non-commercial religious stations across the United States. Our format is dedicated to live, interactive news/talk designed to provide substantive and compelling content that can transform lives and communities.

Our 36 stations operate out of 10 regional centers that provide global, national, regional and community information vital to daily living.

Community Ascertainment

Our stations are highly dedicated to serving their region and communities. The way we succeed in connecting with our audience is to continually examine community needs and address those issues through our news and programming.

Many of our stations have local advisory boards. However, we're finding with technology, we can ascertain the needs of our listeners through email, call-in shows, fund raisers and public events. Every six weeks we conduct an on-line survey with a large "listener advisory board". In the survey, we ask perceptual questions that help us program to the needs, interest and necessity of our audience. Telling stations how to conduct audience research is un-necessary and burdensome.

Our stations also conduct an annual mail survey through our mailing list of over 80,000. We use this survey to measure programming effectiveness and to learn the needs and issues of concern to listeners.

In my earlier years of doing formal community ascertainment, stations in our market pooled resources and participated in group ascertainment. The problem with this approach was that all stations heard the same issues from the same people, which I believe decreased the true spirit of local stations seeking a diversity of feedback on community issues.

Quantitative Program Guidelines

Our stations are dedicated to solid content. We believe that with the convergence of media, the consumer is able to get music from many other sources that may more effectively serve individual music tastes.

We're discovering, and I believe more radio stations are finding, that solid content that relates to community and national concerns will attract an audience. The task of documenting on paper what we're already doing will be burdensome and un-necessary.

Main Studio

Technology has made it possible for us to serve under-served communities with quality radio programming that previously was unavailable to them. A main studio requirement would prevent us from serving those communities from our central regional studio. I would suggest that having a radio facility without a main studio in the community is preferable to not having a local radio service at all.

It is our feeling that an experienced engineer or producer 60 miles away is a more reliable resource for dealing with an emergency than an inexperienced part-timer on site. And finding experienced, mature personnel in smaller communities could present a challenge.

Having the station's public file on the Internet is another way to minimize the need for a local studio. 80% of Americans have Internet access and find it more effective and efficient to go to the station's web site for public file information.

In the same manner, technology allows us to serve and monitor a remote studio without actually having personnel at the local facility. Digital and computer technology allows us full-function control of all aspects of radio station operation, including EANS. Given concerns about the current economics of radio, requiring 24/7 staffing at these stations would not be cost effective. We would be forced to make the difficult decision of selling those stations, or letting them go dark. Again, I would propose that having a local station remotely controlled is preferable to having that station go dark because the owner cannot economically staff that facility.

Voice Tracking and Local Music

Broadcast program automation has been a great boost to the industry in maintaining quality, consistency and personality. Voice tracking can be impersonal and generic. Or properly done, it can sound "live", current, and personable. And voice tracking allows radio to use their best voices and personalities during dayparts that are difficult to staff. Rather than having weak, inexperienced announcers on weekends and overnights, we can feature our best air talent during all dayparts that are most effective in relating to our audience.

As a radio group, we are playing less music and moving to more talk. However, our stations' playlists are a combination of top national music talent mixed with local flavor. Our stations in Alabama tilt to more southern Gospel. Our Florida stations play more conservative "oldies" for the old audience there. And our larger markets feature a heavier mix of urban or Latino sounds. One size does not fit all. Our regional managers have the discretion to program to the tastes of the region.

Conclusion

In summary, I believe much of what the Commission proposes represents an honest attempt to make radio broadcasters more responsive to community needs and more substantive in program content. The competitive nature of media and the convergence of media will force radio stations to relate to

the community, provide substantive content, and to connect with the audience. However, I fear that requirements for increased reporting of programming, increased local staffing in each small community, and requirements to maintain a main studio will force a marked decrease in radio service to those communities. Radio in general, and communities they serve will suffer from reduced regional service and decreased variety in media choices.

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